

1 RENE L. VALLADARES  
Federal Public Defender  
2 State Bar No. 11479  
REBECCA A. LEVY  
3 Assistant Federal Public Defender  
411 E. Bonneville, Ste. 250  
4 Las Vegas, Nevada 89101  
(702) 388-6577/Phone  
5 (702) 388-6261/Fax  
rebecca\_levy@fd.org  
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7 Attorney for Joshua Sadat Washington

8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 v.

13 JOSHUA SADAT WASHINGTON,  
14 AND FEDEL EZEKIEL SAKERS

15 Defendants.  
16

Case No. 2:16-cr-279-JAD-PAL

**STIPULATION TO CONTINUE  
MOTION DATES ONLY**  
(Third Request)

17 IT IS HEREBY STIPULATED AND AGREED, by and between Steven W. Myhre,  
18 Acting United States Attorney, and Robert Knief., Assistant United States Attorney, counsel  
19 for the United States of America, and Rene L. Valladares, Federal Public Defender, and  
20 Rebecca A. Levy, Assistant Federal Public Defender, counsel for Joshua Sadat Washington,  
21 and Christopher Oram, counsel for Fedel Ezekiel Sakers that the parties herein shall have to  
22 and including June 29, 2017, to file any and all pretrial motions and notices of defense.

23 IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they  
24 shall have to and including July 6 2017 to file any and all responsive pleadings.

25 IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they  
26 shall have to and including July 13, 2017, to file any and all replies to dispositive motions.

1 The Stipulation is entered into for the following reasons:

2 1. Both defendants are in custody but do not oppose the continuance.

3 2. Since the filing of the previous stipulation counsels for the defendants have been  
4 diligent in case preparation. However, additional time is needed to allow the respective counsels  
5 for the defendants sufficient time to review recently received discovery.

6 3. Denial of this request for continuance would deny counsels for the defendants  
7 sufficient time to effectively and thoroughly prepare, taking into account the exercise of due  
8 diligence.

9 4. Additionally, denial of this request for continuance could result in a miscarriage  
10 of justice. The additional time requested by this stipulation is excludable in computing the time  
11 within which the trial herein must commence pursuant to the Speedy Trial Act, § 3161(h)(7)(A),  
12 considering the factors under Title 18, United States Code §§ 3161(h)(7)(B).

13 This is the third stipulation to continue filed herein.

14 DATED this 7<sup>th</sup> day of June, 2017.

15  
16 RENE L. VALLADARES  
Federal Public Defender

17 */s/ Rebecca A. Levy*

18 By \_\_\_\_\_

19 REBECCA A. LEVY  
Assistant Federal Public Defender  
20 Counsel for Joshua Sadat Washington

STEVEN W. MYHRE,  
Acting United States Attorney

*/s/ Robert Knief*

By \_\_\_\_\_

ROBERT KNIEF.  
Assistant United States Attorney

21  
22 */s/ Christopher Oram*

23 By \_\_\_\_\_  
CHRISTOPHER ORAM, Esq.  
24 Counsel for Fedel Ezekiel Sakers  
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1                                   **UNITED STATES DISTRICT COURT**  
2                                   **DISTRICT OF NEVADA**

3                   UNITED STATES OF AMERICA,

4                                   Plaintiff,

5                                   v.

6  
7                   JOSHUA SADAT WASHINGTON,  
8                   AND FEDEL EZEKIEL SAKERS

9                                   DEFENDANTS.  
10

Case No. 2:16-cr-279-JAD-PAL

**FINDINGS OF FACT, CONCLUSIONS**  
**OF LAW AND ORDER**

11  
12                                   **FINDINGS OF FACT**

13                   Based on the pending Stipulation of counsel, and good cause appearing therefore, the  
14                   Court finds that:

15                   1.                   Both defendants are in custody but do not oppose the continuance.

16                   2.                   Since the filing of the previous stipulation counsels for the defendants have been  
17                   diligent in case preparation. However, additional time is needed to allow the respective counsels  
18                   for the defendants sufficient time to review recently received discovery.

19                   3.                   Denial of this request for continuance would deny counsels for the defendants  
20                   sufficient time to effectively and thoroughly prepare and submit pretrial motions and notices of  
21                   defense, taking into account the exercise of due diligence.

22                   4.                   Additionally, denial of this request for continuance could result in a miscarriage  
23                   of justice. The additional time requested by this stipulation is excludable in computing the time  
24                   within which the trial herein must commence pursuant to the Speedy Trial Act, §  
25                   3161(h)(7)(A), considering the factors under Title 18, United States Code §§ 3161(h)(7)(B).

26                   This is the third stipulation to continue filed herein.

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The continuance sought herein is excusable under the Speedy Trial Act, title 18, United States Code, Section § 3161 (h)(7)(A), when the considering the factors under Title 18, United States Code, § 3161(h)(7)(B)(i), (iv).

IT IS FURTHER ORDERED the parties shall have to and including July 6 2017 to file any all responses.

DATED this 8th day of June, 2017.

  
UNITES STATES ~~MAGISTRATE~~ JUDGE